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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	)	
	)	Case 3:05-CR-00108-2-JWS
Plaintiff,	)	
	)	
v.	)	
	)	<u>UNITED STATES SENTENCING</u>
SHANNON D. RAINEY,	)	<u>MEMORANDUM</u>
	)	
Defendant.	)	
_____	)	

**SUMMARY OF SENTENCING RECOMMENDATIONS**

**TERM OF IMPRISONMENT ..... 120 MONTHS**

**TERM OF SUPERVISED RELEASE ..... 5 YEARS**

**FINE ..... \$0.00**

**SPECIAL ASSESSMENT ..... \$100.00**

The United States Probation Office [USPO] has prepared the presentence report [PSR] in this case and the United States does not dispute the factual findings the USPO has made. The United States will rely upon the factual statements in the PSR in making its sentencing recommendations.

Following her plea of guilty, the defendant stands convicted of one count of conspiracy, in violation of 21 U.S.C. § 846. Based on the amount of cocaine to which the defendant admitted responsibility as part of her guilty plea, the defendant faces a statutory mandatory minimum sentence of 120 months imprisonment. Unless the defendant satisfies all of the criteria set forth in 18 U.S.C. § 3553(e)—the “Safety Valve,” the court must impose this term of imprisonment. If the defendant satisfies the “Safety Valve” criteria, then, pursuant to the parties’ plea agreement, the parties agree the court should impose a sentence of imprisonment between one and four years. The United States and the defendant will be meeting on February 5, 2007 to give the defendant the opportunity to provide her statement to the United States. The United States will inform the court

of the government's position on the defendant's compliance with the "Safety Valve" criteria prior to the February 9, 2007 imposition of sentence hearing.

RESPECTFULLY SUBMITTED this day, February 2, 2007, in  
Anchorage, Alaska.

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s/Stephan A. Collins  
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